

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT COURT OF WISCONSIN**

SANGER POWERS, ROBERT LEGG,	)	
JENNIFER McCREARY, BETTY OWEN,	)	
And LYDIA POSTOLOWSKI,	)	
individually and on behalf of all others	)	
similarly situated,	)	
	)	
Plaintiffs,	)	
	)	Case No. 3:20-cv-00982-jdp
v.	)	
	)	
FILTERS FAST, LLC, a North Carolina	)	
corporation,	)	
	)	
Defendant.	)	

**PLAINTIFFS' SECOND RENEWED MOTION FOR APPROVAL OF  
ATTORNEYS' FEES, EXPENSES, AND SERVICE AWARD**

Pursuant to Federal Rule of Civil Procedure 23 and this Court's Order granting preliminary approval of the Class Action Settlement, Plaintiffs Sanger Powers, Robert Legg, Jennifer McCreary, Betty Owen, and Lydia Postolowski, individually and on behalf of all others similarly situated (collectively, "Plaintiffs") respectfully again renew their motion for Court approval of requested attorneys' fees, costs, and service awards provided for by the Settlement Agreement. In support of this request, Plaintiffs state and present the following:

1. The terms of the Settlement are set forth in the Settlement Agreement and Release, at Doc. 35-1.
2. The relief sought in this Motion is supported by: the Declaration of William B. Federman, at Dkt. 35-2; the Declaration of William B. Federman filed at Dkt. 59-1; the Declaration of David Lietz filed at Dkt. 59-2; the Detailed Billing and Expenses Report filed at Dkt. 59-3 (under seal); the Docket Sheet for *McCreary v. Filters Fast*, filed at Dkt. 59-4; the Declaration of

Matthew Neylon of Kroll Settlement Administration LLC in Support of Final Approval (Dkt. 53); the Supplemental Declaration of Matthew Neylon of Kroll Settlement Administration LLC in Support of Final Approval, filed at Dkt. 57; the Declaration of James R. Prutsman filed in Support of Plaintiffs' Second Renewed Motion for Final Approval (filed contemporaneously herewith), and; Plaintiffs' Memorandum of Law in Support of Their Second Renewed Motion for Approval of Attorneys' Fees, Costs, and Service Awards, and the supporting declarations attached thereto.

WHEREFORE, Plaintiffs respectfully request that the Court enter the proposed Final Approval filed with Plaintiffs' Motion for Final Approval, approving Plaintiffs' requested fees and out-of-pocket case expenses in the amount of \$320,000 and Service Awards in the amount of \$2,500 per Plaintiff.

Dated: July 1, 2022

Respectfully submitted,

/s/ David Lietz

David Lietz (admitted *pro hac vice*)

DC Bar No. 430557

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*Counsel for Plaintiffs and the Putative Class*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on July 1, 2022, the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on the following ECF-registered counsel of record.

/s/ David Lietz  
David Lietz